

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

D-1 Ricardo Zamora,  
a.k.a. Ricardo Zamora-Lopez,  
a.k.a. Ricardo Zamore-Lopez,

Defendant.

Case: 2:20-cr-20318  
Judge: Murphy, Stephen J.  
MJ: Patti, Anthony P.  
Filed: 07-29-2020 At 01:56 PM  
INDI USA V. SEALED MATTER (DA)

Violations:  
21 U.S.C. §§ 846, 841(a)(1), and  
841 (b)(1)(A)

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

**21 U.S.C. §§ 846, 841 - Conspiracy to Possess with the Intent to Distribute  
Controlled Substances (Cocaine)**

D-1 Ricardo Zamora,  
a.k.a. Ricardo Zamora-Lopez,  
a.k.a. Ricardo Zamore-Lopez,

1. From on or about March 1, 2016, to on or about August 1, 2017, in the Eastern District of Michigan, and elsewhere, defendant, Ricardo Zamora, knowingly and intentionally conspired and agreed with other individuals, both known and unknown to the Grand Jury, to possess with the intent to distribute 5 kilograms or more of Cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and (b)(1)(A).

2. Before Defendant committed the instant offense charged in this count, the defendant had a final conviction for a serious drug felony, namely, a conviction for Delivery and Manufacture of a Controlled Substance (Cocaine) 1000 Grams or More, in Case No. 09-0301275-02-FC, in the 3<sup>rd</sup> Judicial Circuit, Wayne County, in the State of Michigan, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

### **FORFEITURE ALLEGATION**

3. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendants of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set for in this Indictment.

4. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of Defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;

- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER  
United States Attorney

JULIE BECK  
Chief, Drug Task Force Unit

s/Robert J. White  
ROBERT J. WHITE  
Assistant United States Attorney

Dated: July 29, 2020

United States District Court  
Eastern District of Michigan

## Criminal Case Cover

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurate

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :	17-cr-20531-BAF
X Yes No	AUSA's Initials: <i>RLW</i>

Case Title: USA v. Ricardo ZamoraCounty where offense occurred: Wayne

Offense Type: Felony

Indictment -- no prior complaint

## Superseding Case Information

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

Reason:

Defendant NameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

July 29, 2020  
Date

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Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.